

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	
	§	
HOUSTON REAL ESTATE PROPERTIES,	§	CASE NO. 22-32998
LLC,	§	(Chapter 7)
Debtor.	§	
	§	
JOHN QUINLAN, OMAR KHAWAJA,	§	
AND OSAMA ABDULLATIF,	§	
Plaintiffs,	§	ADVERSARY NO. 23-03141
	§	
v.	§	
	§	
HOUSTON REAL ESTATE PROPERTIES,	§	
LLC, et al.,	§	
Defendants.	§	

**PLAINTIFFS' RESPONSE TO ALI CHOUDHRI'S MOTION FOR RECUSAL [DOCUMENT
NUMBER 245] AND NOTICE OF MISREPRESENTATION OF THE RECORD**

Plaintiffs file this Response to Ali Choudhri's Motion for Recusal [Document Number 245] and Notice of Misrepresentation of the Record.

1. On or about Monday, October 21, 2024, Ali Choudhri filed Document Number 245, which is titled "Ali Choudhri's Motion for the Recusal/Disqualification of Judge Jeffrey P. Norman". In it, Ali Choudhri ("Choudhri") grossly misrepresents the record, which necessitates a correction. Hence, Plaintiffs are filing this responsive document.

2. On page 4 of Choudhri's Motion to Recuse, Choudhri makes the following misrepresentation and or misleading statement.

"(4) Judge Jeff Norman has been alleged, under oath by another party in this case Omar Khawaja ("Khawaja"), to have approached him saying that Choudhri is "known as a fraudster."⁵ (See attached depo recently taken of Omar Khawaja)"¹

¹ See page 4 of 16 in Document Number 245.

Choudhri references a deposition transcript from the *In re: Texas REIT, LLC*, debtor, Chapter 11, Case No. 24-10120-smr; In the United States Bankruptcy Court for the Western District of Texas – Austin Division. However, what Choudhri does not do is reference or cite the questions and answers immediately following, which make clear that Mr. Khawaja was referring to a written opinion issued by Judge Norman and not an oral conversation as Choudhri implies on pages 4-5. Here is what Choudhri put in his Motion to Recuse:

·1· · · · A· Yes.

·2· · · · Q· Anything else you reviewed?

·3· · · · A· I think just generally people in the community

·4· know that your client commits fraud. He's known as a

·5· fraudster.

·6· · · · Q· Who are these --

·7· · · · A· So many people have approached me.

·8· · · · Q· Okay. Who are these people?

·9· · · · A· Yeah, I can't -- many people that he's

10· defrauded over the years.

11· · · · Q· Name one.

12· · · · A· Well, Judge Norman is one. I don't know if

13· you know him. He's in the Southern District.

See pages 4-5 of 16 in Choudhri's Motion to Recuse [Document Number 245]. Reading this excerpt by itself gives the reader the impression that Choudhri is contending that Mr. Khawaja had an oral conversation with Judge Norman. However, that is untrue, and Mr. Khawaja immediately made that clear in the questions and answers that Choudhri intentionally omitted in his Motion to Recuse. Here is what the actual and full record reflect.

16	Q. (BY MS. HOOD) All right. That's the first
17	lawsuit that you said you looked at for public record
18	in order to determine that my client is somehow the
19	alter ego of all these other things; correct?
20	A. That's correct.
21	Q. Okay. What other -- what other public records
22	did you review?
23	A. There's also these videos by a guy named Wayne
24	Dolcefino I saw.
25	Q. So you looked at videos.

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TEXAS REIT LLC

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1 A. Yes.

2 Q. Anything else you reviewed?

3 A. I think just generally people in the community
4 know that your client commits fraud. He's known as a
5 fraudster.

6 Q. Who are these --

7 A. So many people have approached me.

8 Q. Okay. Who are these people?

9 A. Yeah, I can't -- many people that he's
10 defrauded over the years.

11 Q. Name one.

12 A. Well, Judge Norman is one. I don't know if
13 you know him. He's in the Southern District.

14 Q. Okay. Who else?

15 A. Let's see. Who else in the community have
16 called him a fraudster?

17 Judge Landrum, Judge Michael Landrum in the
18 Harris County District Court, 164th District Court.
19 He considers your client a fraud.

20 Q. And is that in relation to the HREP case?

21 A. I just think generally.

22 Q. Okay. So Judge Landrum has spoken to you
23 about Mr. Choudhri being a fraudster?

24 A. It's in a final judgment. I can read that for
25 you if you'd like.

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1	Q. No, I'm asking --
2	A. Do you want me to read it to you?
3	Q. No, no, no. I'm asking you. You said people
4	have told you; many people have told you. So I'm
5	asking who --
6	A. Yes.
7	Q. -- who's had a conversation with you about
8	Mr. Choudhri being a fraudster? And you've said Judge
9	Norman, and I'm assuming you didn't --
10	A. Yes.
11	Q. -- talk personally with Judge Norman. That's
12	out of an opinion; right?
13	A. Yes.

See Exhibit 1 to this document, which are portions of the deposition transcript from the *In re: Texas REIT, LLC*, debtor, Chapter 11, Case No. 24-10120-smr; In the United States Bankruptcy Court for the Western District of Texas – Austin Division, which is cited in Choudhri's Motion to Recuse and above. What is noteworthy here, is that Mr. Khawaja makes clear—in no uncertain terms—that he did not talk personally with Judge Norman and instead was referencing a written opinion issued by Judge Norman². See lines 2-13 on page 111 of Exhibit 1. This begs the question: Why would Choudhri leave this out of his Motion to Recuse?—unless he was trying to mislead the reader to achieve his objective irrespective of truth. This is a classic Choudhri litigation tactic to mislead or misrepresent something. And he should be held to account for such improper actions, which is why this document is being filed. Moreover, to the extent Choudhri is going to object to

² Attached as Exhibit 2 is the referenced opinion.

judges that rule against him due to his improper acts and omissions—well then—he’s going to run out of judges.

Conclusion

Accordingly, Ali Choudhri’s Motion for Recusal [Document Number 245] should be denied.

Respectfully submitted,

HOOVER SLOVACEK LLP



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served electronically upon each of the parties on the Court's ECF Service List maintained in this case on October 22, 2024, and or as evidenced below.

23-03141 Notice will be electronically mailed to:

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I, LLC, Dalio Holdings II, LLC,
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